

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND  
NORTHERN DIVISION**

STUDENTS FOR FAIR ADMISSIONS,  
*Plaintiff,*

v.

No. 1:23-cv-02699

THE UNITED STATES NAVAL ACADEMY,  
*et al.,*

*Defendants.*

**PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION**

Per Federal Rule of Civil Procedure 65, Plaintiff Students for Fair Admissions (“SFFA”) moves for a preliminary injunction against Defendants United States Naval Academy; the United States Department of Defense; Lloyd Austin, in his official capacity as Secretary of Defense; Carlos Del Toro, in his official capacity as Secretary of the Navy; Rear Admiral Fred Kacher, in his official capacity as Acting Superintendent of the United States Naval Academy; and Bruce Latta, in his official capacity as Dean of Admissions for the United States Naval Academy. Plaintiff requests an injunction prohibiting Defendants from considering applicants’ race when making admissions decisions.

Plaintiff’s motion is based on the accompanying memorandum of law, supporting declarations, and exhibits. SFFA is entitled to a preliminary injunction because it: (1) has raised serious “questions going to the merits” and demonstrated a “clear showing” of irreparable harm; and (2) has shown that the balance of equities and public interest tip decidedly in favor of preliminary relief. *Multi-Channel TV Cable Co. v. Charlottesville Quality Cable Operating Co.*, 22 F.3d 546, 551 (4th Cir. 1994).

Respectfully submitted,

s/ Cameron T. Norris

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Dated: October 6, 2023

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### **CERTIFICATE OF SERVICE**

I certify that on October 6, 2023, I electronically filed the foregoing with the Clerk of the Court using the Court's ECF system, which will automatically send email notification to all counsel of record. I am also serving the foregoing by email and by certified mail, return receipt requested, to the addresses below:

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s/ Cameron T. Norris